

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	
)	
CITY OF ETROIT, MICHIGAN)	Case No. 13-53846
)	
Debtor)	Chapter 9
)	
)	Hon. Steven W. Rhodes
)	

**LIMITED OBJECTION AND RESERVATION OF RIGHTS OF
COUNTY OF MACOMB, MICHIGAN, BY AND THROUGH ITS COUNTY
AGENCY, THE MACOMB COUNTY PUBLIC WORKS COMMISSIONER
REGARDING THIRD AMENDED DISCLOSURE STATEMENT
WITH RESPECT TO THIRD AMENDED PLAN FOR
THE ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT**

A.County of Macomb, Michigan, a Michigan Constitutional corporation, by and through its County Agency, Anthony V. Marrocco, the Macomb County Public Works Commissioner (“Macomb”), a creditor and party in interest in the above-captioned chapter 9 bankruptcy case, hereby files this limited objection and reservation of rights regarding the Third Amended Disclosure Statement with respect to Third Amended Plan for the Adjustment of Debts of the City of Detroit [Docket No. 4272] (the “Third Amended Disclosure Statement”)¹ and, in support thereof, respectfully states as follows:

Limited Objection and Reservation of Rights

Macomb, like all parties in this case, has had only a short time to review the latest iteration of the disclosure statement. Moreover, Macomb has not yet received any documents in discovery or taken any depositions. Thus, Macomb does not yet have sufficient information to

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Third Amended Disclosure Statement.

evaluate all the statements made in the Third Amended Disclosure Statement, including new language added since the filing of the Second Amended Disclosure Statement regarding the DWSD. See, e.g., Third Amended Disclosure Statement at 21-22, 59. Macomb disputes many of the statements contained therein, including but not limited to the statements with respect to the DWSD, its alleged pension obligations, and the legality of a the Debtor's proposed pre-funding of those obligations. Although Macomb recognizes that the Third Amended Disclosure Statement reflects the Debtor's views on those issues, the statements are presented by the Debtor as fact rather than merely as statements of the Debtor's position. Because this presentation may create the false impression among readers that those issues are uncontested, Macomb requests that the relevant statements be qualified with disclaimer language making clear that they reflect the Debtor's positions on the issues, and that other parties, including Macomb, may dispute or challenge those positions.

Further, Macomb reserves all of its objections to confirmation of the Debtor's plan of adjustment.

Dated: April 27, 2014

Respectfully submitted,

DECHERT LLP

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